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STATE OF WASHINGTON
DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
Emergency Management
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January 6, 1995

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M. Street N.W., Room 222
Washington DC, 20554

Dear Mr. Canton:

Enclosed are an original and ten copies of comments to Docket 94-102.

Sincerely,

A handwritten signature in cursive script, reading "Robert G. Oenning".

Robert G. Oenning
State E911 Coordinator

RGO:jls

Enclosures

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

Washington D.C. 20554

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JAN 9 1995

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In the Matter of

Revision of the
Commission's Rules to ensure
compatibility with enhanced 9-1-1
emergency calling systems.

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CC Docket No. 94-102

RM-8143

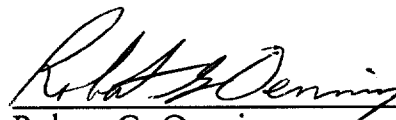
To: The Commission

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COMMENTS IN SUPPORT OF THE APCO/NENA/NASNA
POSITION REGARDING THE PROPOSED RULE MAKING

Comment Date: January 9, 1995

Respectfully submitted
State of Washington
Statewide E911 Program


Robert G. Oenning

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P.O. Box 48346
Olympia, WA 98504-8346

Dated: January 6, 1995

INTRODUCTION

In 1991 the citizens of the State of Washington voted overwhelmingly in favor of Referendum 42 which mandated that enhanced 911 be made available to all citizens of the state by December 31, 1998. Included in the language of this law was the provision that enhanced 911 was to include; "the capability to selectively route incoming 911 calls to the appropriate public safety answering point that operates in a defined 911 service area and the capability to automatically display the name, address, and telephone number of incoming 911 calls at the appropriate public safety answering point.". This functional service definition did not make exception for the type of telephonic service the citizen was utilizing at the moment. The referendum was submitted to the voters of the state by the legislature after the life saving potential of enhanced 911 systems had been demonstrated by functioning systems in the more populous counties.

The state's program to make enhanced 911 available to all citizens is moving swiftly with all counties nearing completion of final implementation plans that may well have state-wide enhanced 911 available by the end of 1996. In conjunction with this progress the Washington Utilities and Transportation Commission has mandated that all local exchange carriers provide enhanced 911 service tariffs, and has recently extended that requirement to competitive access providers. All of whom have complied, with the result that enhanced 911 can be made available to all wireline telephone customers in the state.

The issue of private branch exchange interfaces to enhanced 911 was noted as a problem early in the implementation of the systems. Meetings were held with the PBX user community to clarify the issue and to assist them where possible to understand and mitigate the issue. This accelerated to a detailed study of the problem culminating with a report and recommendations issued in 1993. A number of counties in the State of Washington have implemented local ordinances codifying these recommendations into regulations that mandate that certain PBX owners fully integrate their systems with the county's enhanced 911 system. A bill that would require this for the entire state is currently being considered in the state legislature. During the study PBX owners were invited and requested to present their views on the issue and none disputed the desirability of connecting to the enhanced 911 system in a manner that would allow them to fully utilize the life saving feature of that system. However, they almost universally noted that there were no mandated standards that assured that the suppliers of the telephone systems would include the connectivity in the system design. They also noted that the existing interface parameters were rudimentary when compared to the advanced signaling manufacturers were providing for their corporate networks and suggested that the use of newer technologies would allow the creation of interfaces with the public safety community's 911 systems which could improve operations for both.

The issue of wireless communications was to some degree addressed by the 1994 Washington State Legislature which passed a statute that requires that all wireless service providers in the State of Washington provide Automatic Number Identification (ANI). The existing cellular providers have been testing interfaces to provide this capability and are at this moment implementing ANI to the enhanced 911 systems. It is anticipated that the experience gained in connecting these existing wireless services will be passed on to the new wireless providers so that they may comply with the requirement. However, the issue of Automatic Location Identification (ALI) has yet to be addressed. As the number of calls from wireless systems to 911 continues to increase dramatically this functional deficiency in the systems will need to be addressed since it is clearly a degradation of the service level mandated by the citizens in 1991.

Both of these issues only become a very serious problem when the caller cannot for some reason verbally provide directions to the responding emergency service agency. That does happen infrequently, but when it happens it is almost always a life or death situation. The experience with wireline enhanced 911 systems indicates that as our population becomes increasingly mobile there is an increasing number of calls where the caller does not know their address, increasing the value of ALI beyond just those critical incidents to a being a key element in many response situations. The State's PBX Task Force recommendations addressed this situation by acknowledging that certain circumstances increase the probability of the lack of correct automatic location information being a serious system deficit. The most critical of those situations for PBX s was when the system is used to service single family dwelling units, particularly apartment complexes, where both adults and children rely on the telephone as their link to emergency assistance. Wireless telephone systems simply move that critical situation into a mobile arena where there is an even greater probability that the caller cannot assist with verbal location information simply because they do not know their address at the moment. The wireless industry has demonstrated how the decrease in the cost of pocket wireless phones, combined with aggressive marketing campaigns, can dramatically increase the use of these units. The increase in wireless system and PBX supported telephone units without all the features of enhanced 911 serves only to move the customers of those systems away from the clear goal of having universal enhanced 911 service, something the citizens of the state of Washington voted strongly to support.

POSITION

Degradation of enhanced 911 service to any degree must be taken seriously. When that degradation is due to the lack of manufacturers including interconnect provisions in their equipment it is particularly disturbing. This is amplified when those who wish to acquire equipment that can interface to enhanced 911, as private branch exchange owners overwhelmingly have indicated they wish to do, are thwarted by a lack of product availability that meets publicly adopted standards. When the potential degradation of enhanced 911 functionality is due to the introduction of new telephone systems that are touted as "personal" in nature it is an unacceptable situation. The APCO/NENA/

NASNA position regarding the Commission's Rules to ensure compatibility with enhanced 9-1-1 emergency calling systems will allow the degradation of enhanced 911 services to be minimized for both private branch exchange systems and wireless networks.

In working with competitive access providers, PBX owners and manufacturers and wireless communications services providers it has become clear that there are advances in network architecture and signaling protocols that can be utilized to make what the citizens believe they will get when dialing 911, selective routing, automatic number identification and automatic location information, actually be what is delivered to the public safety answering point. There has been great progress in moving toward some resolution of this issue as witnessed by the positions taken at the TIA/PCIA/APCO/NENA/NASNA Wireless Joint Experts meeting of October 1994. We support that position recognizing that its bias, if any, is toward the side of improving competition while allowing for quality communications between citizens and the agencies responsible for responding to their requests for assistance.

To not mandate a connectivity standard for wireless in particular, and to some degree for PBXs, has the potential to create a very noncompetitive environment where one service provider in an area implements full connectivity to enhanced 911 utilizing proprietary protocols. That provider would then be in a advantaged position to capitalise on the public's desire for enhanced 911 capabilities. In addition to reducing effective competition in the short term, this would create a likely long term scenario where the enhanced 911 systems would need to accommodate multiple interface protocols from wireless as the each providers developed additional a protocol to give their customers full enhanced 911 features. A mandate under the APCO/NENA/NASNA position will support increased competition.

The commission should rule decisively to set the tone that the communications industries must consider the effects of their designs and products on enhanced 911 systems, and that they must work with the public safety associations to implement standards that provide for universal access to fully featured enhanced 911 systems. Again, the Commission should consider the APCO/NENA/NASNA position as a minimum level reasoned approach to assuring that enhanced 911 continues to serve the citizens of the United States.